

HELENA ROSS hereby declares under penalty of perjury that the following is true and correct:

1 I make this declaration in support of Plaintiffs' motion for a preliminary injunction.

2. I am a Social Worker licensed to practice in New York. I am the Social Work Supervisor of the Mount Sinai Hospital Visiting Doctors Program ("Visiting Doctors Program").

3. I am Madeline Andrews' social worker, through the Visiting Doctors Program. I have seen her once time in person, and spoken to her multiple times on the telephone for 4.5 months. Because she cannot leave her home, I visit her there.

4. I first spoke with Adult Protective Services ("APS") regarding Ms. Andrews on November 28, 2006. I called Ms. Andrews' caseworker, Dora Morris, and she told me that she was going to be applying for Medicaid for Ms. Andrews and thought the process could be expedited if the Visiting Doctors Program completed an M11Q (a Medical Request For Home Care form). I told Ms. Morris that the Visiting Doctors Program would prepare an M11Q and get it to her as soon as possible.

5. In or about late November of 2006 I sent Ms. Morris a completed M11Q for Ms. Andrews.

6. On or about December 26, 2006 I called Ms. Morris to follow up on whether Ms. Andrews' Medicaid case was yet active. Ms. Morris said it was not, and that she would call me as soon as it was.

7. In or about the mid January of 2007, and on January 12<sup>th</sup>, I again called Ms. Morris about Ms. Andrews' Medicaid application

8. On or about January 23, 2007, I again called Ms. Morris to see if there was any progress on Ms. Andrews' Medicaid application. She did not return my call.

9. On February 14<sup>th</sup>, I again called Ms. Morris to see if there was any progress on Ms. Andrews' Medicaid application. She had no information.

10. On March 6<sup>th</sup>, I again called Ms. Morris and left a message and did not receive a call back from Ms. Morris.

11. On March 19, 2007, I again called Ms. Morris, who told me that she had visited Ms. Andrews the week before and thought that Ms. Andrews was not doing well. She also told me that she had "no idea" what was going on with Ms. Andrews' Medicaid application, even though I had been calling her every two weeks about the application's progress. She seemed to think that APS' Medicaid unit had lost the application, and told me that she had begun a new application for Medicaid.

12. I told her that that was unacceptable, that Ms. Andrews' application had been put in months before, and that it would have been faster for me to go through a community application.

13. The next week I called APS three times. Ms. Morris finally admitted to me that there was no record of Ms. Andrews' application, although I had been calling every two weeks for the past five months.

WHEREFORE, I respectfully request that this Court grant Plaintiffs' motion for a Preliminary Injunction directing the defendants to promptly provide or ensure the provision adequate protective services to them.

Dated: April 1, 2007  
New York, New York

  
HELENA ROSS